

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION**

Litchfield Financial Corporation
Textron Financial Corporation
Land Finance Company

Plaintiffs

V.

Buyers Source Real Estate Group, et al

Defendants

Civil Action No. 04CV30076KPN

**DEFENDANT'S THOMAS H. BREWER AND BETTY M. BREWER'S MOTION FOR
EXTENSION OF TIME TO FILE AMENDED ANSWER WITH COUNTERCLAIMS**

The Defendants, Thomas H. Brewer and Betty M. Brewer, pursuant to rules 13 (f) and 15 (a) of the Federal Rules of Civil Procedure respectfully move this Court for extension of time to file an amended answer with counterclaims in the above civil action.

In support of this Motion, the Defendants state as follows:

1. On August 3, 2004, the United States District Court for the Eastern District of Virginia issued an Order Appointing Receiver that states except leave of that Court, during the pendency of the Receivership ordered herein, all defendants' customers, investors and creditors seeking to establish or enforce any claim, right, or interest against the Receivership Defendants relating to Buyers Source Sugarmill, L.L.C., a Virginia limited liability company, Buyers Source Valley Group, L.L.C., a Virginia limited liability company, Island Realty, L.L.C. f/k/a Buyers Source Island, L.L.C., an Arkansas limited liability company, (collectively referred to as "Buyers

Source"), and Belmont Properties, Inc., a Virginia corporation, and all others acting for or on behalf of such persons, including attorneys, trustees, agents, sheriffs, constables, marshals and other officers and their deputies, and their respective attorneys, servants, agents, and employees, are hereby stayed and restrained from:

a. commencing, prosecuting, continuing, or enforcing any suit or proceedings against the Receivership Defendants, except that such actions may be filed to toll any applicable statutes.

2. In consideration of the August 3, 2004 Order, Defendants have filed a Motion to Stay these proceedings and Motion to toll the applicable Statute of Limitations on any counterclaim they should have against the plaintiffs arising of same action or occurrence as defined in Rule 13 (a) of the Federal Rules of Civil Procedure.

3. As a result, plaintiffs will not be pursuing the suit against defendants at this time and will be seeking leave of the United States District Court for the Eastern District of Virginia to exempt them from Stay. Plaintiffs have stated that they have no intention of violating the Order by taking further action in this case against the Receivership Defendants and are going to seek relief from the Order in the action pending in the Eastern District of Virginia so that this case can proceed as to those defendants.

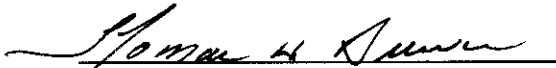
4. Any such relief could take considerable time to be granted and is an indefinite event.

5. Defendants, Thomas H. Brewer and Betty M. Brewer, have valid counterclaims to make against plaintiffs but such counterclaims will be costly and a heavy burden on defendants to pursue.

6. As such, defendants should not be forced to bear that burden until such time as plaintiff's claims against defendants can proceed.

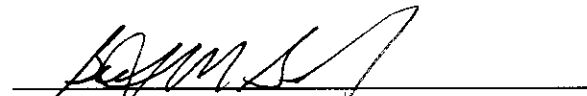
IN CONSIDERATION WHEREFORE, Thomas H. Brewer and Betty M. Brewer pray this honorable Court **ORDER** that the time for the Defendant's to file an Amended Answer with counterclaims be extended until twenty (20) days after the entry of an Order permitting plaintiffs to pursue this action against Defendants.

Respectfully submitted,



Thomas H. Brewer
113 Northgate Lane
Suffolk, Virginia 23434

Respectfully submitted,



Betty M. Brewer
113 Northgate Lane
Suffolk, Virginia 23434

CERTIFICATE OF SERVICE

A copy of the foregoing Motion was serviced by First Class U.S. Mail this 8th day of October, 2004 upon the following:

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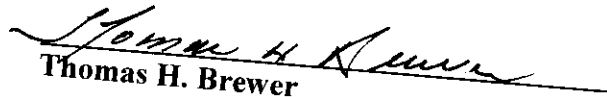
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